JUDICIAL MERIT SELECTION COMMISSION PERSONAL DATA QUESTIONNAIRE

Court, Position, and Seat # for which you are applying:

1. Name: The Honorable Paul Edgar Short, Jr.

> Name that you are known by if different from above (Example: A Nickname):

Are you currently serving in some capacity as a judge? (Includes Municipal, Magistrate, Etc.)

Yes S.C. Court of Appeals, Seat 1

Home Address:

Business Address: 140 Main Street

Post Office Box 1006

Chester, South Carolina 29706

E-Mail Address:

Telephone Number:

(home):

(office):

(803) 581-5011

2. Date of Birth: 1947

Place of Birth:

Gastonia, North Carolina

Social Security Number:

Are you a citizen of South Carolina?

Yes

Have you been a resident of this state for at least the immediate past five years?

Yes

3.

SCDL# or SCHD#: 4.

Voter Registration Number:

5. Family Status: In the space below, (a) state whether you are single, married, widowed. divorced, or separated; (b) if married, state the date of your marriage and your spouse's full name; (c) if you have ever been divorced or are in the process of obtaining a divorce, state the date, name of the moving party, court, and grounds; and (d) state the names of your



children and their ages. If your children are old enough to work, include the occupation of each child.

Married on June 14, 1968 to Linda Huffstetler Short Never divorced, two children:

- 6. Have you served in the military? If so, give the dates, branch of service, highest rank attained, serial number (if applicable), present status, and the character of your discharge or release.
 - U.S. Army, June 1968; Entered active duty August 1971; Discharged from active duty November 1971; Served in the South Carolina National Guard until 1973; Discharged U.S. Army Reserve 1974; Highest rank attained was Captain; Present status: Honorably Discharged.
- 7. List each college and law school you attended, including the dates of your attendance, the degrees you received, and if you left an institution without receiving a degree, the reason for your departure.
 - (a) The Citadel; 1964-1968; B.A. Political Science;
 - (b) University of South Carolina School of Law; 1968-1971; Juris Doctorate:
 - (c) University of Nevada/Reno; Summers 1998-2001 (All course work for Master in Judicial Studies completed).
- 8. List the states in which you have been admitted to practice law and the year of each admission. Also list any states in which you took the bar exam but were never admitted to the practice of law. If you took the bar exam more than once in any of the states listed, please indicate the number of times you took the exam in each state.

 (a) South Carolina; 1971.
- 9. List the significant activities in which you took part during your attendance at college, graduate, and law school. Give the dates you were involved in these activities and list any leadership positions you held.
 - (a) The Citadel: Assistant Manager, Basketball Team, 1964-1965; ROTC, 1964-1968; Squad Sergeant, 1966; 2nd Lt. Corp of Cadets, 1968; Member Senior Class Board of Directors;
 - (b) University of South Carolina School of Law: Phi Delta Phi Legal Fraternity; Law Clerk of Attorneys Betty Sloan and Claud Sapp, 1969-1971.
- 10. Describe your continuing legal or judicial education during the past five years.

Conference/CLE Name		Date(s)
(a)	S.C. Bar Conv., Criminal Law Section	1/20-23/11;
(b)	S.C. Bar Conv., Trial & Appellate Advocacy Section	1/20-23/11;
(c)	S.C. Circuit Court Judges' Conference	5/4/11:
(d)	S.C. Assoc. for Justice Annual Meeting	8/4-7/11;
(e)	Annual Judicial Conference	8/17-19/11;

(f)	Southern Region High Court Conference	9/15/11:
(g)	Annual Judicial Conference	8/22-24/12;
(h)	Research Fundamentals on Westlaw	10/24/12;
(i)	S.C. Defense Attorneys Association, Annual Meeting	11/8-11/12;
(j)	S.C. Bar Conv., Trial & Appellate Advocacy Section	1/24-27/13;
(k)	S.C. Bar Conv., Part 2: Criminal Law Section	1/24-27/13;
(1)	An Overview of SC Workers' Compensation Law	4/17/13;
(m)	Annual Judicial Conference	8/21-23/13;
(n)	S.C. Defense Attorneys Association, Annual Meeting	11/7-10/13;
(o)	Annual Judicial Conference	8/20-22/14;
(p)	S.C. Defense Attorney Association, Annual Meeting	11/6-9/14;
(q)	S.C. Bar Conv., Trial and Appellate Advocacy Section	1/22-25/15;
(r)	S.C. Bar Conv., Civil Law Update	1/22-25/15;
(s)	S.C. Bar Conv., Part 2: Criminal Law Section	1/22-25/15;
(t)	All About E-Filing	4/29/15;
(u)	23rd Annual Forum for State Appellate Court Judges	7/9-12/15;
(v)	Annual Judicial Conference	8/19-21/15;
(w)	S.C. Defense Attorneys Association, Annual Meeting	11/5-8/15.

- 11. Have you taught law-related courses or lectured at bar association conferences, educational institutions, or continuing legal or judicial education programs? If so, briefly describe each course or lecture.
 - (a) I have made presentations to Circuit Court Judges about the Court of Appeals at the Circuit Court Judges' Conference;
 - (b) I spoke on the topic <u>Case File Development and Review</u>, A View from the <u>Judiciary</u> at the South Carolina Solicitors' Conference;
 - (c) I have served as a Group Facilitator with the faculty for a General Jurisdiction Course at the National Judicial College/Reno, Nevada for new judges leading group discussions four hours each day on a wide variety of legal topics;
 - (d) I was an instructor for a Seminar for the South Carolina Legal Secretaries Association on the topic of Rules of Civil Procedure.
- List all published books and articles you have written and give citations and the dates of publication for each.
 None
- 13. List all courts in which you have been admitted to practice and list the dates of your admission. Give the same information for administrative bodies that require a special admission to practice.
 - (a) South Carolina Supreme Court, 1971;
 - (b) United States District Court of South Carolina, 1972;
 - (c) United States Fourth Circuit Court of Appeals, 1974.
- 14. Describe chronologically your legal experience since graduation from law school and include a list of all law firms with which you have been associated. Describe the general

character of your practice and divide it into periods with dates if its character has changed over the years.

- (a) Strickland and Hardin, General Practice of Law, 1971;
- (b) Strickland, Hardin, and Short, General Practice of Law, 1972;
- (c) Strickland, Short, and Keels, General Practice of Law, 1974;
- (d) South Carolina Circuit Court At-Large Seat 8, 1991;
- (e) Resident Judge, Sixth Judicial Circuit Court, 1999;
- (f) South Carolina Court of Appeals, 2004.
- 15. Please answer the following (if you are a judge and <u>are not seeking a different type of judgeship</u>, this question is inapplicable):
 - (a) If you are a candidate for Family Court, please provide a brief written description of your experience within each of the following Family Court practice areas: divorce and equitable division of property, child custody, adoption, abuse and neglect, and juvenile justice. Include information about cases you have handled in each of these practice areas, or if you have not practiced in an area, describe how your background has prepared you to preside over such matters as a Family Court Judge.
 - (b) If you are a candidate for Circuit Court, please provide a brief written description of your experience in criminal matters, including any cases handled over the past five years and include a brief description of the issues involved. Further, please provide a brief written description of your experience in civil matters, including any cases handled over the past five years and include a brief description of the types of matters handled, issues involved, and procedural history. Please include information such as the primary areas in civil court in which you practice, whether you represent plaintiffs or defendants, or both. You may go back further than five years if you feel it would assist the Commission with its assessment of your experience. If you lack experience in an area, describe how your background has prepared you to preside over such matters as a Circuit Court Judge, or how you would compensate for your lack of experience in this area.
 - (c) If you are a candidate for Master-In-Equity, please provide a brief written description of your experience in the Master's court, including any cases handled over the past five years and include a brief description of the issues involved. Please include the frequency of your appearances before a Master-In-Equity.
 - (d) If you are a candidate for Administrative Law Judge, please provide a brief written description of your experience before an Administrative Law Judge, including any issues discussed and the frequency of your appearances before the Administrative Law Judge Court.
- 16. What is your rating, if any, by any legal rating organization, such as, <u>Best Lawyers</u>, <u>Chambers</u>, <u>Legal 500</u>, <u>Martindale-Hubbell</u>, <u>Who's Who Legal</u>, <u>Super Lawyers</u>, <u>etc.</u>? If you are currently a member of the judiciary, list your last available rating, if any.

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* Retired justices/judges and justices/judges applying for re-election to their current position may omit Questions 17-22. If a candidate is seeking a

judgeship different than his or her current position, Questions 17-22 should be answered based on experience prior to serving on the bench.

17.	What was the frequency of your court appearances during the five years prior to your election to the bench? (a) federal: (b) state:	
18.	What percentage of your practice involved civil, criminal, domestic, and other matters during the five years prior to your election to the bench? (a) civil: (b) criminal: (c) domestic: (d) other:	
19.	What percentage of your practice in trial court during the five years prior to your election to the bench involved matters that went to a jury, including those that settled prior to trial? (a) jury: (b) non-jury: Did you most often serve as sole counsel, chief counsel, or associate counsel in these matters?	
20.	ist five of the most significant litigated matters you have personally handled in either trial appellate court or before a state or federal agency, prior to your election to the bench, ive citations if the cases were reported and describe why these matters were significant.	
21.	List up to five civil appeals you have personally handled, prior to your election to the bench. Give the case name, the court, the date of decision, and the citation if the case was reported. (a) (b) (c) (d) (e)	
22.	List up to five criminal appeals that you have personally handled, prior to your election to the bench. Give the case name, the court, the date of decision and the citation if the case was reported. (a) (b) (c) (d)	

- 23. Have you ever held judicial office? If so, list the periods of your service, the courts involved, and whether you were elected or appointed. Describe the jurisdiction of each of the courts and note any limitations on the jurisdiction of each court.

 Yes
 - (a) July 1991-February 1999, South Carolina Circuit Court At-Large Seat 8, Elected;
 - (b) February 1999-June 2004, Resident Judge Sixth Judicial Circuit Court, Elected;
 - (c) July 2004-Present, South Carolina Court of Appeals Seat 1, Elected.
- 24. If the answer to question 23 is yes, describe or list five of your most significant orders or opinions and give the citations if they were reported. Also list citations to any appellate review of these orders or opinions.
 - (a) Cannon v. SCDPPS, 361 S.C. 425, 604 S.E.2d 709 (Ct. App. 2004) reversed, 371 S.C. 581, 641 S.E.2d 429 (2007), superseded by statutory amendment, 2008 S.C. Laws Act 413 (finding the DNA Act requires samples from parolees paroled prior to the enactment of the Act but still on parole at the time of the enactment; although reversed by the South Carolina Supreme Court in 2007, the Legislature amended the Act in 2008 as interpreted in the Court of Appeals' opinion);
 - (b) Gillman v. City of Beaufort, 368 S.C. 24, 627 S.E.2d 746 (Ct. App. 2006) (holding as a matter of first impression that a plaintiff pedestrian could not add the Department of Transportation and the State as indispensable parties after the expiration of the statute of limitations);
 - (c) <u>Lukich v. Lukich</u>, 368 S.C. 47, 627 S.E.2d 754 (Ct. App. 2006), *affirmed*, 379 S.C. 589, 666 S.E.2d 906 (2008) (declaring an annulment voiding a first marriage does not relate back to validate a second marriage);
 - (d) In re Manigo, 389 S.C. 96, 697 S.E.2d 629 (Ct. App. 2010), affirmed, 398 S.C. 149, 728 S.E.2d 32 (2012) (holding the provision for civil commitment under the South Carolina Sexually Violent Predator Act does not require a person to be currently serving a sentence for a sexually violent offense);
 - (e) Beaufort Cty. Sch. Dist. v. United Nat'l Ins. Co., 392 S.C. 506, 709 S.E.2d 85 (Ct. App. 2011), cert. dismissed, Dec. 20, 2011 (finding the school district's settlement of seven students' sexual molestation claims against one teacher gave rise to seven claims under a sexual abuse and sexual harassment endorsement to the district's commercial general liability policy).
- 25. Have you ever held public office other than judicial office? If so, list the periods of your service, the office or offices involved, and whether you were elected or appointed. Also, state whether or not you have timely filed your report with the State Ethics Commission during the period you held public office. If not, were you ever subject to a penalty? If so, give details, including dates.

 Yes
 - (a) South Carolina House of Representatives, Reports timely filed, Elected, 1982-1991;
 - (b) Chester County Attorney, Report not required, Appointed, 1980-1982;
 - (c) Chester County Airport Commission, Report not required, Appointed, 1978-1980.

- 26. List all employment you had while serving as a judge (whether full-time or part-time, contractual or at will, consulting or otherwise) other than elected judicial office. Specify your dates of employment, employer, major job responsibilities, and supervisor.

 None
- 27. Have you ever been an unsuccessful candidate for elective, judicial, or other public office? If so, give details, including dates.
 - (a) I withdrew as a candidate for the South Carolina Court of Appeals Seat 6 on February 4, 2003, after having been selected as one of three candidates nominated by the Judicial Merit Selection Commission.
 - (b) I withdrew as a candidate for the Chief Judge of the South Carolina Court of Appeals on approximately January 27, 2010.
- 28. Have you ever been engaged in any occupation, business, or profession other than the practice of law, teaching of law, or holding judicial or other public office? If so, give details, including a description of your occupation, business, or profession, the dates of your employment, and the name of your business or employer.

Textiles, Inc., Gastonia, North Carolina

I worked as a textile employee during the summers while in college; 1964-1968.

- 29. Are you now an officer or director or involved in the management of any business enterprise? Explain the nature of the business, your duties, and the term of your service.
- 30. Provide, as a separate attachment, a complete, current financial net worth statement that itemizes in detail:
 - (a) the identity and value of all financial assets held, directly or indirectly, including, but not limited to, bank accounts, real estate, securities, trusts, investments, and other financial holdings; and
 - (b) the identity and amount of each liability owed, directly or indirectly, which is in excess of \$1,000, including, but not limited to, debts, mortgages, loans, and other financial obligations.

(Your response to this question may state "see attached").

(A net worth statement is provided with this questionnaire and you must use this format for submission of your financial statement.)

A complete, current financial net worth statement was provided to the Commission. See attached.

NOTE: The Commission may require written confirmation that financial obligations have been satisfied or that the parties have agreed upon a payment schedule.

31. Describe any financial arrangements or business relationships you have, or have had in the past, that could constitute or result in a possible conflict of interest in the position you seek. Explain how you would resolve any potential conflict of interest.

None

- 32. Have you ever been arrested, charged, or held by federal, state, or other law enforcement authorities for violation or for suspicion of violation of any federal law or regulation, state law or regulation, or county or municipal law, regulation, or ordinance, or any other law, including another country's law? If so, give details but do not include traffic violations for which a fine of \$125 or less was imposed.

 No
- 33. Have you, to your knowledge, ever been under federal, state, or local investigation for possible violation of a criminal statute? If yes, explain.
 No
- 34. Has a tax lien or other collection procedure ever been instituted against you by federal, state, or local authorities? Have you ever defaulted on a student loan? Have you ever filed for bankruptcy? If so, give details.

 No; No
- 35. Have you ever been sued, either personally or professionally, that is, have you ever been named as defendant or respondent in any court of law? If so, give details, including, but not limited to, dates and resolution.

 Yes

I was sued as a member of the Chester County Legislative Delegation by a taxpayer who demanded that the Delegation, rather than the Chester County School Trustees, set the school tax miliage rate. The Circuit Court later ruled that the Chester County Board of School Trustees had the taxing authority.

After becoming a Circuit Court Judge, I was sued by a prisoner acting pro se. The case was filed in United States District Court and the Civil Action Number was 4:92-2623-3BD, entitled: Priest Gerald Garner, #170960 v. Charles Molony Condon, Solicitor; Lee E. Berlinsky, Asst. Solicitor; Paul E. Short, Jr., Judge; Det. Guy R. Vanhorn; Det. M. Benton; Det. Kay Colleton; and William L. Howard, Judge. I was dismissed from the case by Order dated August 26, 1993, which was duly signed and executed by Judge Ross Anderson.

I was also sued by another prisoner, Mark Steven Fortier. This case was entitled Mark Steven Fortier v. Medlock, et al., Civil Action Number 3:920 C.V.-33121. This case was filed in United States District Court by Mr. Fortier against the Attorney General for South Carolina, me, as Circuit Court Judge, and several other officials. Mr. Fortier was the first State Wide Grand Jury case involving pornography. I was the sentencing judge and Mr. Fortier was apparently unhappy with his sentence. I was subsequently dismissed from the case by a United States District Court Judge.

I was also sued by Mr. Reco Cauthen, although I was never served with process as required by the S.C. Rules of Civil Procedure. I presided over Mr. Cauthen's trial of Grand Larceny, Kidnapping, Possession of a Weapon during the Commission of a Violent Crime, Armed

Robbery and Burglary 1st Degree in November 2003 in Chester, South Carolina. During the trial, Mr. Cauthen was allegedly placed in a holding cell with two of his co-defendants who had turned State's evidence. The suit arose out of an alleged fight which ensued.

In conjunction with all of the judges of the South Carolina Court of Appeals, I have been sued related to the appellate decision in <u>Jarmuth v. International Club Homeowners Ass'n</u>, <u>Inc.</u>, Op. No. 2015-UP-111 (S.C. Ct. App. filed March 11, 2015). This is a pending action in the original jurisdiction of the Supreme Court of South Carolina, which is being defended by J. Emory Smith, Deputy Solicitor General, Office of the Attorney General, P.O. Box 11549, Columbia, S.C. 29211, (803) 734-3680.

- 36. Have you ever, in South Carolina or any other jurisdiction, as a lawyer, judge, or other professional, been sanctioned or disciplined for lawyer, judicial, or other professional misconduct or has any jurisdiction found that you committed any misconduct? If so, give the details and describe any final disposition.
 - [Yes and no responses are redacted for all candidates unless there is a public discipline.]
- 37. Have you ever been investigated by the Department of Social Services? If so, give the details and the resolution. Has your name ever been enrolled on the Central Registry of Child Abuse and Neglect? If so, give the details.

 No
- 38. If you are in private practice, are you covered by malpractice insurance and, if so, how long have you carried malpractice insurance? If applicable, have you ever been covered by a tail policy? If so, please explain when you were covered by a tail policy. Also, if applicable, indicate your coverage and deductible for your current malpractice policy. N/A
- 39. Are you active on or a member of a social media or Internet site or have you, to your knowledge, been featured or depicted on a social media or Internet site, such as, Facebook, LinkedIn, Twitter, etc.? If so, how would your use of social media or other similar types of Internet sites be affected if you were serving in a judicial capacity? No
- 40. Are you now or have you ever been employed as a "lobbyist," as defined by S.C. Code § 2-17-10(13), or have you acted in the capacity of a "lobbyist's principal," as defined by S.C. Code § 2-17-10(14)? If so, give the dates of your employment or activity in such capacity and specify by whom you were directed or employed.
- 41. Since filing with the Commission your letter of intent to run for judicial office, have you accepted lodging, transportation, entertainment, food, meals, beverages, money, or any other thing of value as defined by S.C. Code § 2-17-10(1) from a lobbyist or lobbyist's principal? If so, please specify the item or items you received, the date of receipt, and the lobbyist or lobbyist's principal involved.

No

42. S.C. Code § 8-13-700 provides, in part, that "[n]o public official, public member, or public employee may knowingly use his official office, membership, or employment to obtain an economic interest for himself, a member of his immediate family, an individual with whom he is associated, or a business with which he is associated." Please detail any knowledge you have of any formal charges or informal allegations against you or any other candidate for violations of these provisions. Include the disposition, if any, of such charges or allegations.

None

43. S.C. Code § 8-13-765 provides, in part, that "[n]o person may use government personnel, equipment, materials, or an office building in an election campaign." Please detail any knowledge you have of any formal charges or informal allegations against you or any other candidate for violations of these provisions. Include the disposition, if any, of such charges or allegations.

None

- 44. Itemize (by amount, type, and date) all expenditures, other than those for travel and room and board, made by you, or on your behalf in furtherance of your candidacy for the position you seek. If you have spent over \$100, have you reported your expenditures to the House and Senate Ethics Committees?

 None
- 45. List the amount and recipient of all contributions made by you or on your behalf to members of the General Assembly since the announcement of your intent to seek election to a judgeship.

 None
- 46. Have you directly or indirectly requested the pledge of any member of the General Assembly as to your election for the position for which you are being screened or have you been offered a conditional pledge of support by any legislator pending the outcome of your screening? Have you received the assurance of any public official or public employee that they will seek the pledge of any member of the General Assembly as to your election for the position for which you are being screened? If so, give details.

Note: The flash drive with your application materials contains (1) Section 2-19-70(c); (2) JMSC Rule 24, and (3) informal opinions and letters concerning pledging prohibitions, with which third parties acting on your behalf, as well as you, must comply.

No; No

47. Have you requested any third parties to contact members of the General Assembly on your behalf before the final and formal screening report has been released? If so, give details. Are you aware of any third parties contacting members of the General Assembly on your behalf? If so, give details.

No; No

- 48. Are you familiar with the 48-hour rule, which prohibits a candidate from seeking pledges until after the draft report becomes final, which occurs on the day and time specified on the Commission's published screening schedule?

 Yes
- 49. Have you or has anyone acting on your behalf solicited or collected funds to aid in the promotion of your candidacy? If so, please specify the amount, solicitor, donor, and date of the solicitation.
 No
- 50. Since submitting your letter of intent to become a candidate, have you or has anyone acting on your behalf contacted any member of the Judicial Merit Selection Commission about your candidacy or intention to become a candidate? If so, give details.

 No
- List all bar associations and professional organizations of which you are a member and give the titles and dates of any offices you have held in such groups.
 - (a) Chester County Bar Association;
 - (b) South Carolina Bar Association;
 - (c) Appellate Judges Association;
 - (d) American Bar Association.
- 52. List all civic, charitable, educational, social, and fraternal organizations of which you are or have been a member during the past five years and include any offices held in such a group, any professional honors, awards, or other forms of recognition received and not listed elsewhere.
 - (a) Sertoma International, Life Member;
 - (b) Chester Shrine Club;
 - (c) Chester Masonic Lodge;
 - (d) American Legion;
 - (e) Chester Men's Golf Association;
 - (f) Chester/Fairfield Citadel Club.
- Provide any other information that may reflect positively or negatively on your candidacy, or which you believe should be disclosed in connection with consideration of you for nomination for the position you seek. This information may include how your life experiences have affected or influenced the kind or type of judge you have been or plan to be.

While practicing law, I had the pleasure to serve and to gain valuable experience on the Board of Commissioners on Grievances and Discipline.

I am a former Deacon and Elder of Purity Presbyterian Church.

I have recently been appointed by the Chief Justice to serve on the South Carolina Chief Justice's Commission on the Profession.

- 54. List the names, addresses, and telephone numbers of five (5) persons, including your banker, from whom you are providing references. Also, provide the Commission with original letters of recommendation from each person listed herein, including their signature (preferably in blue ink). The Commission will not accept a photocopy or electronic submission of a letter of recommendation and failure to include all five (5) original letters of recommendation in your packet when you submit it will render your packet incomplete. Please do not have references mail your reference letters to the Commission directly. You must return the five (5) original letters of recommendation to the Commission with your application packet.
 - (a) Mrs. Brenda T. McBrayer (803) 377-7151
 Vice-President, First Citizens Bank
 1612 J A Cochran ByPass
 Chester, South Carolina 29706
 - (b) Rev. Clint H. Davis (803) 385-2228 Post Office Box 174 Chester, South Carolina 29706
 - (c) Mr. Daniel R. Settana, Jr. (803) 256-4645 Post Office Box 7217 Columbia, South Carolina 29202
 - (d) Mr. Marvin Waldrep (803) 581-6222 129 Church Street Chester, South Carolina 29706
 - (d) Sheriff Alex Underwood (803) 581-5131 2740 Dawson Drive Chester, South Carolina 29706
- 55. Describe any interest you or a member of your immediate family has in real property:
 - (a) in which there is a potential conflict of interest with your involvement in a South Carolina state or local public agency;
 - (b) in which there have been public improvements of \$200 or that adjoins property in which there have been public improvements of \$200; or
 - (c) which was sold, leased, or rented to a state or local public agency in South Carolina.

None

List the interest you hold and the value and location of the property. Identify as applicable the:

- (a) nature of any potential conflict of interest;
- (b) nature and value of any public improvements; and
- South Carolina state or local public agency which purchased or is leasing or renting (c) such property.

Attach a copy of any contract or agreement.

None

Identify any personal property interest you or a member of your immediate family sold, 56. leased, or rented to a South Carolina state or local public agency. Identify the property, its amount or value, and the name of the agency. Attach a copy of any contract or agreement.

None

57. For sitting judges, have you used judicial letterhead or the services of your staff, for which you did not pay, while campaigning for this office?

No

YOUR SIGNATURE WILL BE HELD TO CONSTITUTE A WAIVER OF THE CONFIDENTIALITY OF ANY PROCEEDING BEFORE A GRIEVANCE COMMITTEE OR ANY INFORMATION CONCERNING YOUR CREDIT.

I HEREBY CERTIFY THAT MY ANSWERS ARE TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE

Sworn to before me this 12 day of July, 2016.

Bother L. Sanday

Notary Public for South Carolina

My Commission Expires: 11-15-2018